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22 *Co-Lead Counsel for Plaintiffs*

23 IN THE UNITED STATES DISTRICT COURT

24 FOR THE NORTHERN DISTRICT OF CALIFORNIA

25
 26 IN RE: UBER TECHNOLOGIES, INC.,
 27 PASSENGER SEXUAL ASSAULT
 28 LITIGATION

Case No. 23-md-03084-CRB

29 This Document Relates to:

30
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL

31 ALL CASES

32 **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

33 Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider
 34 whether certain materials should be sealed. Plaintiffs file these materials under seal out of an
 35

1 abundance of caution because they contain references to documents produced and marked
 2 confidential by Uber.

3 **Material To Be Filed Under Seal**

4 The materials to be filed under seal are exhibits attached to the parties' Joint Discovery
 5 Letter Brief Pursuant to ECF No. 3848. Plaintiffs request the Court consider whether the
 6 following should be filed under seal:

Document	Description	Designating Party
Exhibit A to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit B to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit C to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit D to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit E to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit F to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit G to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber
Exhibit H to the Declaration of B. Wilkins in support of Plaintiffs' Statement in Joint Discovery Brief	References to information deemed confidential	Uber

1 Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish
 2 that all of the designated material is sealable, and must “file a statement and/or declaration as
 3 described in subsection (c)(1)” of the Local Rules. None of the information at issue was
 4 marked confidential by Plaintiffs. Pursuant to the Court’s order at Dkt. 1559, Uber must file
 5 its statement within one day.

6 This motion complies with Civil Local Rule 7-11 and 79-5, and the following
 7 attachments accompany this motion:

- 8 1. The Declaration of Roopal P. Luhana in Support of this Motion; and
 9 2. A Proposed Order that lists in tabular format all material sought to be sealed.

10 Dated: September 15, 2025

Respectfully submitted,

11 By: /s/ Roopal P. Luhana

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28 *Co-Lead Counsel for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify under penalty of perjury that on September 15, 2025, I authorized the
3 electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system,
4 which will send notification of such filing to registered parties.

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6 */s/Roopal Luhana* _____
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